

**EXHIBIT A**  
(CONTINUED)

who put up money for the match was Randy Bauer, who is now a USCF Board member. Bauer assumed that Brock would win easily and he wanted to see Sloan humiliated. Thousands watched this match over the Internet as it was played. They were astonished when Sloan beat Brock and won the \$1000 green cash. The games are preserved and recorded with comments on chessgames.com and numerous other websites. The address of William Brock is 230 West Monroe, Suite 330, Chicago, Illinois 60606-4701.

36. It was during the lead-up to this chess match that the Fake Sam Sloan first appeared and started posting. The Fake Sam Sloan posted while Sloan was up in the air flying to Chicago and therefore could not read the Internet and respond. Obviously, under these circumstances, Brock was an immediate suspect. Nobody suspected Truong or Polgar because at that time Sloan was still on friendly terms with Polgar, having been friends with her since 1986. It is certain by following the threads that the Fake Sam Sloan who first posted on June 25, 2005 is the same person as the Fake Sam Sloan who is posting right now, today.

37. Randall Hough is a professional chess tournament organizer residing in Los Angeles, California. He is a member of the Executive Board of the United States Chess Federation, having been elected to a three year term in 2006. He has been called a mindless sycophant and lapdog of Goichberg by Sloan, but in truth he does sometimes exercise independent thought and action, although not often. Hough resides at 1826 Garvey Avenue, Unit 5, Alhambra, California 91803.

38. Randy Bauer is a member of the Executive Board of the United States Chess Federation having been elected in 2007 to a four year term. He was also a member of the board during the 2004-2005 year but was defeated when he ran for re-election. He is best known for having been Budget Director of the State of Iowa under Governor Tom Vilsack who later ran for President of the United States. Bauer was Chairman of the USCF Finance Committee for two years from 2005 to 2007 but did not do anything. He resides at 3923 - 153<sup>rd</sup> Street, Uniondale, Iowa 50323.

39. Jim Berry is a member of the Executive Board of the United States Chess Federation having been elected in 2007 to a three year term. He resides in Stillwater, Oklahoma where he is on the Board of Directors of a major bank. His address is PO Box 351, Stillwater, Oklahoma 74056.

40. Texas Tech University is a university located in Lubbock, Texas. It recently hired Polgar and Truong to be members of its faculty perhaps without doing a thorough background check. Polgar was allowed to give a commencement speech to graduates of that university, ironic since Polgar never went to school herself much less a university. Texas Tech even gave her an honorary doctoral degree and now refers to her as "Dr. Polgar". In introducing her to the students before her commencement speech, the University President said that she had won the Woman's World Championship four times. This statement was utterly false, but Polgar, who was standing beside him, did not contradict it. The address is simply Texas Tech University, Lubbock, Texas 79409.

41. Texas Tech University has allowed Polgar and Truong to use the computers of the University to impersonate Sam Sloan and Ray Gordon and to post Fake Sam Sloan and Fake Ray Gordon messages on the Internet.

42. The United States of America is named as a defendant herein because Plaintiff is petitioning for the Department of Justice to supervise a new election for the Executive Board of the United States Chess Federation.

## COUNT I

## TRUONG AND POLGAR IMPERSONATED PLAINTIFF WITH THREE THOUSAND INTERNET POSTINGS FROM JUNE 25, 2007 TO THE PRESENT DATE

43. Plaintiff repeats and re-alleges each and every allegation of Paragraphs 1 through 42 of this complaint.

44. The Internet postings by the "Fake Sam Sloan" started on June 25, 2005 while Plaintiff was running in the 2005 election in which he was defeated. Here is the first or one of the first postings by the Fake Sam Sloan:

Newsgroups: rec.games.chess.politics  
From: "Sam Sloan" <whocares@registerednurses.com>  
Date: 25 Jun 2005 09:58:39 -0700  
Local: Sat, Jun 25 2005 12:58 pm  
Subject: Why did Marinello and Shaughnessy make a deal with Natrol?

2 questions for Dr. Dubeck:

1. How many members did the USCF lose under Beatriz Marinello?

FACT: The USCF lost the most members ever under Beatriz Marinello. It's the worst record by any president.

2. How much money did Beatriz Marinello and Elizabeth Shaughnessy make for signing a deal with Natrol for selling BrainSpeed pills to kids? If they didn't then why don't they tell us who signed the stupid deal with Natrol? Cat got their tongues?

FACT: Both are making a living in scholastic chess and both endorsed a dumb deal to sell chess wonder pills to kids. What does that say about their judgment?

These are two of the reasons why I will vote for myself 4 times.

If you need me, contact me through Bill Brock.

46. Note that the email address for the Fake Sam Sloan was at that time whocares@registerednurses.com . Plaintiff has never had that email address. It attacks USCF President Beatriz Marinello and board member Elizabeth Shaughnessy. This was the first of several email addresses for the Fake Sam Sloan. Only a few days later, the Fake Sam Sloan changed email addresses to sloan@journalist.com . Note that it says "If you need me, contact me through Bill Brock". This shows that the Fake Sam Sloan knew that I was on an early morning flight to Chicago to play a chess match with Bill Brock and thus would not be able to respond immediately to this posting.

47. Here is a posting from a different email address only five days later. It is clear from a variety of clues that it is the same person:

Newsgroups: rec.games.chess.politics

From: "SamSloan" <sloan@journalist.com>  
Date: 30 Jun 2005 16:48:53 -0700 Local:  
Thurs, Jun 30 2005 7:48 pm  
Subject: Bulldyke Marinello lies again

How much money did you make for Natrol? Why only apologized to the scholastic community? What about the rest of the members? Where's that apology letter? How much money did you make as COO and President? I'm not supporting Bauer, Shutt, Shaughnessy, or John until you're converted. The best candidate is clearly me.  
Sam Sloan

48. Note that the email address for the Fake Sam Sloan was at that time sloan@journalist.com. Plaintiff has never had that email address. The posting attacks USCF President Beatriz Marinello as a "bulldyke". An Internet search for the word "Bulldyke" will produce 41 uses of this term. All of them have now been shown to have been authored by Polgar and Truong. Polgar is known for long disliking Marinello, who is her rival because she is also a chess master and is the Former South American Woman's Champion and she is also more beautiful than Polgar. This posting also makes disparaging comments about four opponents for USCF election, Bauer, Shutt, Shaughnessy, and George John. This demonstrates that the Fake Sam Sloan was trying to influence the outcome of the election. (All four of those candidates lost that election, as did Plaintiff.)

49. Evidence establishes that board members William Goichberg and Joel Channing have known all along that Paul Truong was the Fake Sam Sloan. Their actions since the uschess.org website administrator proved through IP addresses that Paul Truong and the Fake Sam Sloan are one and the same demonstrates this. Goichberg has ordered the Forum Moderators to remove all postings pertaining to Truong being the Fake Sam Sloan but he is allowing criticism of the administrator, Brian Mottershead, who proved this. Members are being allowed to attack and vilify Mottershead all they want, but any criticism of Truong or Polgar is not allowed. In addition, Goichberg is disobeying and ignoring advice of counsel in this regard. USCF Counsel, Michael Matsler has advised Goichberg to collect the evidence and get Truong off the board as soon as possible or else be implicated in a cover-up. Goichberg has done exactly the opposite. He had ordered the forum moderators to remove all the evidence from public view plus he had asked Polgar and Truong plus two other board members who have indicated that they want to resign amid this scandal, Joel Channing and Jim Berry to stay on the board until he can find a satisfactory replacement to run against Sloan and Donna Alaria. (Donna Alaria is a USCF member who has been investigating the finances and has uncovered many financial irregularities.) Thus, what is going on right now is a Brezhnev-style Soviet Cover-Up led and directed by the USCF President Bill Goichberg.

50. Further evidence that Goichberg and Channing have known for more than one year that Truong was impersonating Sloan comes in the form of the following email that Sloan sent to the entire board including Goichberg and Channing one year ago on July 30, 2006 just a few days before Sloan who had already won the election was scheduled to take his seat on the board:

From: sloan@ishipress.com (Sam Sloan) Date: Mon, 31 Jul 2006 16:59:44 GMT Local:  
Mon, Jul 31 2006 12:59 pm

Subject: Paul Truong is the Fake Sam Sloan

The big mystery in chess over the past year and especially over the just completed election

period has been the identity of the Fake Sam Sloan. The Fake Sam Sloan has been flooding the chess newsgroups and especially rec.games.chess.politics with so many postings that it was sometimes difficult for anyone to discuss anything else. There were times when the Fake Sam Sloan would post 20 or 30 articles in a batch, covering all of the active discussion topics so that it became difficult to find the real discussions that were taking place.

Eventually, every regular viewer of the groups came to realize that there was a Fake Sam Sloan posting and that there were certain telltale signs to make it possible to distinguish between the Real Sam Sloan and the Fake. For example, postings by the Real Sam Sloan were usually long and literate. Postings by the Fake Sam Sloan were usually short and obscene, often only one line long.

One problem was that there were imitators. At one point there seemed to be four Fake Sam Sloans posting, each with a different writing and posting style, so this made it even more difficult to distinguish the Real Sam Sloan from the Fakes.

However, the other Fake Sam Sloans would usually lose interest and quit after a short while. The Real Fake Sam Sloan continued persistently for more than a solid year with no breaks, whereas the Fake Fake Sam Sloans would quit after a week or two.

A break came when the Fake Sam Sloan abruptly stopped posting on July 4, 2006, a day when the real live Sam Sloan was in Philadelphia handing out campaign literature to the voters and therefore could not possibly be posting on the Internet. Then, on July 21, 2006, just after the votes had finished being counted and it had been determined that Sam Sloan had been elected, ChessPromotion, previously identified as Paul Truong, started a barrage of postings attacking Sam Sloan, often posting as many as 25 times in one day to the USCF Forums.

Although the style of writing and other things were different, one similarity was the habit of filling up all the active discussion topics with the same repetitions messages so that no other subject could be discussed. Only the Fake Sam Sloan had done that and when Paul Truong started doing the same thing, it suddenly became apparent that Paul Truong was the Fake Sam Sloan.

That was not the only clue. Almost from the beginning, ever since July 17, 2005, Stan Booz and Neil Brennen had both been saying that Paul Truong was the Fake Sam Sloan. However, since Booz and Brennen were themselves suspected of being the Fake Sam Sloan, their postings were discounted.

The first Fake Sam Sloan posting was on June 25, 2005 as whocares@registerednurses.com from NNTP-Posting-Host: 66.2.156.67 .

That was just as the real live Sam Sloan was flying to Chicago to play the Famous Grudge Match against Bill Brock. That Fake Sam Sloan clearly knew that the Real Sam Sloan would be flying to Chicago and would not be on the Internet at that point in time. That Fake Sam Sloan seemed to be Ray Gordon. He posted 16 times from that address and quit only three days later on June 28. He last posted from NNTP-Posting-Host: 66.2.156.242 .

Previously, somebody was posting from whocares@registerednurses.com but as Ray Gordon, who wrote on June 18, 2005 from NNTP-Posting-Host: 4.237.38.175 : "What do you expect from scumbags like Booz and his chief bull dyke Marinello?"

This is the form of postings by the Fake Sam Sloan to the present. A Google search of the word bulldyke (one word) will show that this word has been used 41 times, always by the Fake Sam Sloan and always in reference to Beatriz Marinello. Bull dyke (two words) had been used 73 times, always in reference to Beatriz Marinello.

Because there were nine postings from as whocares @ registerednurses.com and signed Ray Gordon from June 18 to June 24, 2005, but after that postings from as whocares@registerednurses.com were signed Sam Sloan, this led everyone to conclude that the Fake Sam Sloan was Ray Gordon. However, the Real Ray Gordon denied that this was him, and it now seems obvious that that was a Fake Ray Gordon. There were many other postings by a Fake Ray Gordon later on and the Real Ray Gordon actually filed suit in federal court in the Eastern District of Pennsylvania against Google about this. He lost the case and the court's decision against him has become part of his signature.

Previously, there were 22 unsigned posting from that same email address. Most of them attacked Marinello as a Bull Dyke, but many of them also attacked Goichberg, Channing and Hanke as well. One said:

"beatchess, goichberg, hanke, ES are all scumbags. Who gives a fuck about them?"

The next Fake Sam Sloan first posted on June 28, 2005 from sloan@journalist.com and NNTP-Posting-Host: 66.2.156.214 and last posted on December 17, 2005 from that address. He thereafter immediately shifted over the sloan@whoever.com and started posting from there. It was clearly the same fake, as the writing style and content was the same.

On July 18, 2005, there was a posting from and NNTP-Posting-Host: 4.237.41.219 but signed StanB which said: "Sam, you're a scumbag. Do you like 12 year old girls?"

This seemed to be something that the real Stan Booz would write, leading many to conclude that Stan Booz was the Fake Sam Sloan. Just six minutes later there was a posting from the same email address but from NNTP-Posting-Host: 4.237.38.188 which said: "What about a bulldyke like Marinello? Who does she have to play with?"

The last posting from sloan @ journalist .com was on January 11, 2006 and NNTP-Posting-Host: 64.12.116.69

The next Fake Sam Sloan seems to have been a different person. This Fake Sam Sloan never attacked Marinello but attacked other people instead, posting at sloan@whocares.com and NNTP-Posting-Host: 152.163.100.69 from only January 4 to January 11, 2006.

There have been several other Fake Sam Sloans, but they do not show the characteristics of

the main one, who most often calls Marinello a bulldyke. For example there was samsloan@ishiipress.com (note the ii in ishiipress) who only posted a few times.

The most recent Fake Sam Sloan is samsloan@usa.com This one first posted on March 17, 2006 from NNTP-Posting-Host: 205.188.117.73 and last posted on July 4, 2006 from NNTP-Posting-Host: 152.163.100.67 .

Here is that last posting: "I left you alone for a few weeks and now you want to go crazy? Up yours scumbag! You're history. Run asshole! I hate all the fucking bull dykes in the USCF. They can all gag on my dick. "Sam Sloan"

The latest Fake Sam Sloan had learned to delete his postings shortly after they appeared. During the election period he would often post 20 or 30 per day. However, those that survive in some format were those to which there was a response. Most regulars learned to just not respond so that they would go away.

What is the proof that the main Fake Sam Sloan was all this time Paul Truong? In 2004, Paul Truong called me to inform me that Beatriz Marinello was a lesbian. I told him that I did not believe it, as she had been married to a prominent New York chess master. Truong replied that this was just a green card marriage.

A consistent theme throughout these Fake Sam Sloan postings is that Beatriz Marinello is a bulldyke. Most people have no care nor concern about the private life of a chess player or anybody else for that matter. Obviously the Fake Sam Sloan does.

The Fake Sam Sloan consistently has certain people that he attacks. Most notable are Stan Booz and Neil Brennen. He also attacks Ray Gordon and Tim Hanke.

So, one must look for someone who dislikes Sam Sloan, Beatriz Marinello, Stan Booz, Neil Brennen, Ray Gordon and Tim Hanke.

Paul Truong is known to dislike all those people. There are few people who dislike all of those people, especially since most people who like Sam Sloan dislike Beatriz Marinello and most people who like Beatriz Marinello dislike Sam Sloan.

There is the fact that the Fake Sam Sloan and the Real Paul Truong often post as many as 25 times per day. Not many people have time for that. Truong says that he is retired and apparently has lots of spare time on his hands.

Truong has a long history of creating fake personalities. For example, it is proven that he was "Bob Bennett" although he still denies this. Paul Truong now posts as ChessPromotion to the USCF Forums and as ChessMarketing to the Yahoo groups and never signs his real name.

Two of the primary targets of attack by the Fake Sam Sloan have stated from the beginning that Paul Truong was the Fake Sam Sloan.

On July 17, 2005, Stan Booz wrote: "I don't; I think its your good buddy PT."

<http://groups.google.com/group/rec.games.chess.politics/msg/668ac6133...>

On July 17, 2005, Neil Brennen wrote (obviously referring to Paul Truong):

<http://groups.google.com/group/rec.games.chess.politics/msg/8abb320be...>

"> ><http://www.geobytes.com/IpLocator.htm?GetLocation>

> OK. This is mildly interesting but does not prove much.

> sloan @journalist.com (one of the fake posters) posts at 4.237.41.136

> According to the above website, that is in Flushing, NY.

"Doesn't a well-known female GM (recently praised in a press release by an alleged co-worker as one of the three top GMs in the world) run a chess school near Flushing? Didn't the male half of Trollgar like to post under assumed names?"

Under the heading Who am I? In a posting that was soon thereafter deleted, the Fake Sam Sloan provided a list of 11 persons who could possibly be himself.

As chess master Bruce Leverett noted, the Fake Sam Sloan would have to be a person whose name was not on the list and who has a history of deleting his own postings.

<http://groups.google.com/group/rec.games.chess.politics/msg/16ab72bf6...>

Paul Truong fits both criteria. Thus, it is proven that Paul Truong is the Fake Sam Sloan. All evidence points to Truong. No evidence points in any other direction. Truong had the knowledge, the resources, the motivation and the capability to perpetuate this hoax. Being retired he has a lot of time on his hands and the time and the resources to post as many as 25 of these fake messages per day.

When all other possibilities have been excluded, the remaining one, however improbable, must be the truth.

#### The Real Sam Sloan

51. In response to the above letter, Goichberg and Channing did not take any appropriate action which might have included further investigation to establish the identity of the Fake Sam Sloan. To the contrary, Goichberg, without board authorization, wrote the first of five letters to USCF Counsel Michael Matsler asking how he could get rid of Sam Sloan and stop him from taking his seat on the board to which he has been elected. To his credit, Mr. Matsler replied to each of these letters that basically there was no way to do it without risking legal liability and that for example refusal to certify the election results would be ineffective. (These five letters are available on the Confidential USCF BINFOS online.) Michael Matsler's attorney's bill for August 2006 of \$2,790 and for September 2006 of \$1998, for a grand total of \$4788 was for responding to these repeated inquiries by Bill Goichberg asking how to get rid of Sam Sloan. These bills were paid by the USCF and Plaintiff contends that Goichberg should reimburse the USCF because it was only in the interest of Goichberg and not in the interest of the USCF that Sloan not be allowed to take his seat on the board.

52. Throughout his one year on the board, Plaintiff demanded that the USCF undertake an investigation to determine who the Fake Sam Sloan was. The board had it easily within its power to determine the identity of the Fake Sam Sloan because during the latter half of 2006 and the first half of 2007 it often occurred that the Real Sam Sloan (the plaintiff here) would post something to the USCF Forums, which are closed and can only be read by registered adult USCF members, and within 15 minutes the Fake

Sam Sloan would copy and paste the same thing to the public newsgroup, rec.games.chess.politics, while usually changing a few words to exaggerate or reverse the meaning. Since there is usually light traffic on the USCF Forums with five or less members logged in at any one time, and since this happened often, it would have been an easy task for Mike Nolan, the USCF website administrator, to determine which one of those five was the Fake Sam Sloan. Also, Mike Nolan could have done the same thing that Brian Mottershead did last week, which was check the IP address of Paul Truong and Susan Polgar and compare that with the IP address of the Fake Sam Sloan and the Fake Ray Gordon. Not only did Bill Goichberg and Joel Channing fail to tell Mike Nolan to do this but rather they told him not to do it. They also severely and publicly criticized Sloan for making this suggestion and publicly censured him for this.

53. The above facts and circumstances clearly establish that not only Polgar and Truong but also Goichberg and Channing were active participants in the impersonations of Sloan in the three thousand Internet postings by the Fake Sam Sloan. For these and other reasons, Polgar, Truong, Goichberg and Channing should be removed from the Executive Board of the United States Chess Federation and should be made to pay money damages. It may also be pointed out that there may be criminal penalties for the above actions.

## COUNT II

### THE PICTUREGATE AFFAIR

54. Plaintiff repeats and re-alleges each and every allegation of Paragraphs 1 through 53 of this complaint.

55. After Sloan won the 2006 election, catching Polgar, Truong, Goichberg and Channing off-guard because they thought he had no chance, Polgar and Truong who had been silent during the election campaign suddenly launched a tremendous barrage of personal attacks on Sloan. A bizarre claim that Polgar suddenly made was that in 1986 when Sloan was staying as a guest at the Polgar home in Budapest, Sloan had propositioned Polgar and asked to sleep with her when she was "a minor at the time". She claimed that she had rebuffed his advances, that Sloan had been kicked out of the family home and that she had not had anything to do with him or wanted anything to do with him ever since. It was stated that Sloan was a "child molester" for wanting to sleep with a 17-year-old girl, Susan Polgar.

56. Sloan countered that nothing like that has occurred, Sloan had never been kicked out of the Polgar Family home in Budapest. He has stayed there several times in 1986 the last time being when they all departed together to play in the Copenhagen Open Championship in Denmark won by Smyslov and after that they had traveled together to chess tournaments in San Juan Puerto Rico and Rio Gallegos Argentina and that a book published by Laszlo Polgar, Susan's father, in Budapest, showed Sam Sloan and Susan Polgar together appearing very friendly to each other. In addition Sloan pointed out that in 2003 Susan Polgar had asked Sloan to pose with her for a picture taken by Truong and that picture is available on the Internet by a simple Google search for "Sam Sloan Susan Polgar".

57. Polgar and Truong had apparently forgotten about that picture and when it was discovered by Grant Perks that it was available on the Internet they started a tremendous barrage of personal attacks on Sloan, joined in by Goichberg and Channing. This became known in chess circles as the "Picturegate Affair".

58. Goichberg and Channing repeatedly demanded that the picture be removed from the Internet. Sloan

replied that the picture needed to stay up because it proved that the accusations by Polgar and Truong were false. This resulted in Goichberg writing more letters to attorney Michael Matsler asking what legal action could be taken to bring about the removal of the picture. This resulted in more legal bills incurred by the USCF. Goichberg and Channing made a motion that Sloan be publicly censured for the picture. In the heat of the debate, Sloan replied that not only was the Polgar-Truong Story entirely false but the actions of Goichberg and Channing were, "like a bull in a china shop", at the point of forcing Sloan to reveal what had really happened between himself and Susan Polgar in 1986 and that his relationship with Polgar had been "not entirely Platonic".

59. This resulted in even more outrage. On the motion to censure, Goichberg, Channing and Goichberg's lapdog Hough voted to censure and Schultz and Marinello voted against. Sloan was required to abstain and so the motion passed. The motion publicly censuring Sloan for the Picturegate Affair and related matters was publicly posted on the Home Page on the uschess.org website where it has been read by tens of thousands and possibly millions of people.

60. Plaintiff contends that this public humiliation of Sloan and two other motions censuring Sloan that were also posted on the USCF Home Page were entirely unwarranted and improper and as a result the defendants should be required to pay to Plaintiff ten million dollars in damages.

### COUNT III

#### ACCUSATIONS THAT PLAINTIFF IS A CHILD MOLESTER AND A PURVEYOR OF "KIDDIE PORN"

61. Plaintiff repeats and re-alleges each and every allegation of Paragraphs 1 though 60 of this complaint.

62. Throughout this entire affair, defendants to this action have posted thousands of times on the public Internet accusations that Plaintiff is a child molester, a pornographer and a purveyor of "kiddie porn". This accusation is utterly false. Not only is it not true but Sloan has never been arrested, convicted, accused, investigated, charged, questioned or anything of that nature by any competent legal authority. Nevertheless these accusations have been posted so many thousands of times that the response by others is, "if that is true, stop bothering us and call the cops".

63. The main purveyor of these false accusations in Defendant William Brock. Brock was banned from posting to the USCF Forums for this but he has continued to post to other public forums the same or similar accusations, including even on the Wikipedia Encyclopedia where he listed Sloan under the category of "child molesters". Nobody seems to know why Brock keeps doing this. In this, Brock has been joined by Polgar and Truong posting both as themselves and as the Fake Sam Sloan, by Herbert Rodney Vaughn, by Joel Channing and by several other defendants.

64. Please note that unlike traditional print media such as newspapers which are often thrown away and forgotten about the next day, these Internet postings will be preserved and kept for the next one thousand years long after all of us are dead. Even if the original posters decide to delete these postings they will already have been picked up and spread around the Internet. A simple search for the words Sam Sloan child molester will return numerous postings mostly by Bill Brock. There are so many that they can never be completely removed.

65. Plaintiff demands judgment in the amount of ten million dollars for the allegations in this count.

## COUNT IV

## ILLEGAL SALE OF THE USCF BUILDING IN NEW WINDSOR NY AND ILLEGAL MOVE TO CROSSVILLE TENNESSEE

66. Plaintiff repeats and re-alleges each and every allegation of Paragraphs 1 through 65 of this complaint.

67. At the annual USCF Delegates meeting in Cherry Hill NJ in August 2002, Frank Niro, who was USCF Executive Director at the time, proposed that the USCF sell the building in New Windsor NY and move to Miami, Florida where the World Chess Hall of Fame would offer land to build a building there. Niro claimed that he had a buyer for the building in New Windsor who was willing to pay \$600,000, which was more than the market value of the building, because this buyer wanted to build a shopping mall there and had already purchased all the surrounding property and just needed this one last piece.

68. Because Frank Niro was at that time held in high regard and it was not yet known that he was a big crook, the delegates voted by a slim margin to approve this plan.

69. Turns out that the whole thing was a lie, a complete fabrication. There was no such buyer. Nobody was planning to build a shopping mall there. Also, the proposal from the World Chess Hall of Fame that the USCF build a building on their land was an exceptionally bad deal. Since there was no such buyer, the building was not sold at that time.

70. In November 2004, Bill Goichberg, who by then had become Executive Director, on his own without any vote by the delegates or the board, sold the New Windsor Building for \$513,000.

71. This was an exceptionally bad deal and would never have been approved by the delegates. Goichberg claimed that the August 2002 vote to sell the building gave him the authority to sell it in November 2004, more than two years later, without further action by the board. However, between 2002 and 2004 as everybody knows the market for real estate similar to this building had doubled. While \$600,000 in 2002 might have been a good deal, \$513,000 in 2004 was an exceptionally bad deal.

72. The Board subsequently voted to move to Crossville, Tennessee. The final vote to move was a telephone vote that passed by only 3-1 and was taken just weeks before the new board was going to take over. By then, three board members had dropped out and there were only four active board members left. One of the drop-outs, VP of Finance Tim Hanke, had left a message that he had volunteered to go to Iraq and fight in the War. His final message dated February 2004 was about Polgar's threat to sue him. This decision to move to Crossville was taken without asking for or receiving the advice of legal counsel. Plaintiff maintains that the legal requirements for a volunteer board of a not-for-profit corporation to bring about such a major move and change were not met.

73. The move to Crossville has proven to be a disaster. Apparently, the board believed that the USCF could hire the hillbillies in Crossville cheaper than the big city slickers in New Windsor. The opposite has proven true. The new hires in Crossville were all hired at higher salaries than their laid-off counterparts in New Windsor were making. In addition the new people in Crossville make a lot of mistakes. The fact that the board hired an utterly worthless Executive Director has not helped either. The USCF lost a reported \$130,000 during its first fiscal year in Crossville. Although in the just completed fiscal

year after Grant Perks cooked the books, there is an officially reported surplus of \$3,000, that includes \$107,000 in imaginary money and in real money the USCF lost \$150,000.

74. Plaintiff demands a declaratory judgment that the sale of the building in New Windsor and the move to Crossville was null and void.

#### COUNT V

#### FINANCIAL IRREGULARITIES INCLUDING THE PENSION/PROFIT SHARING PLAN AND OTHERS

75. Plaintiff repeats and re-alleges each and every allegation of Paragraphs 1 through 74 of this complaint.

76. Prior to being elected to the board Plaintiff was informed by a former CFO of the USCF that there were major irregularities in the pension/profit sharing plan and in one case a large sum of money that was owed to a former employee had been absorbed into the general operating account instead.

77. Accordingly, as soon as Plaintiff took his seat on the board, at his first meeting of the board on August 14, 2006, he immediately demanded complete information about the Pension / Profit Sharing Plan. Bill Hall, Executive Director, stated that he could not do that because virtually all USCF records from the former New Windsor office had been lost or destroyed during the move to Crossville. A debate or discussion of this subject continued for about 45 minutes. Everybody on the board understood that the records were going to be unavailable.

78. As a member of the board, Plaintiff was legally a Trustee of the Pension/Profit Sharing Plan. Accordingly, Plaintiff feared being implicated in a cover up if he kept secret the fact that all financial records had been lost or destroyed. Therefore, after waiting for a week in the hope that the missing records might turn up, Plaintiff went public with this and revealed this information.

79. Bill Goichberg immediately started yelling and screaming in public that this was not true and he has frequently cited this as a false statement by Sloan. Meanwhile, the missing financial records have not shown up.

80. More than one year has since passed. In all this time, not one document, not one financial record, not even one piece of paper from the New Windsor Office has been produced. It is true that the 2003 Truong four-way contract and the 2000 AF4C contract to hold the US Championship have been produced and these were two of the documents that Plaintiff had been demanding, but those documents were found in the files of the USCF's lawyer Michael Matsler, not in the USCF offices in Crossville.

81. One of the perks of being on the board are that board members are appointed as liaisons to various committees. There are numerous volunteer committees of the USCF and members of those committees are usually experts in that field. For example, members of the USCF ratings committee are likely to be PhDs in probability and statistics. However, after Sloan took office on the board Goichberg refused to appoint Sloan as a liaison to any committee, not even to the new committee that had been formed on Sloan's motion, the Olympic Hosting Committee. Thus, Sloan and the members who voted for Sloan were denied the influence that a board member is entitled to have.

82. After Sloan took office on the board, Goichberg, as USCF President, instructed Dan Lucas, the editor of Chess Life, not to publish Sloan's name in the magazine, except as required for being a member of the board. Thus, if Plaintiff played an interesting game of chess, that game would not be published in Chess Life. On at least two occasions a journalist submitted an article for publication in Chess Life with the name of Sam Sloan in the article and the editor of Chess Life struck out Sloan's name, so that when the article appeared the name of Plaintiff was not there. In addition, Plaintiff is a publisher of books and published four chess books while on the board. The regular book reviewers for Chess Life submitted reviews of Sloan's books for publication in Chess Life magazine and none of these reviews have been published for the same reason.

83. Because of the allegations in this complaint as set forth above, including the allegations made by Bill Goichberg, William Brock and other defendants, Plaintiff was expelled from the Marshall Chess Club located at 23 West Tenth Street, New York NY in April, 2007. Plaintiff had been a regular denizen of that club for more than 40 years since 1964. Plaintiff has suffered grievous loss and harm as a result of being expelled from the Marshall Chess Club, all of which was caused by the Defendants.

84. The by-laws of the USCF require that either a transcript or a tape recording of every meeting of the USCF Executive Board be posted on the Governance page of the USCF Website. Plaintiff has persistently demanded that this by-law be observed and that a tape or a transcript of the meeting in Oak Brook Illinois held on August 14, 2006, the meeting held in Stamford Connecticut on November 17-18, 2004, the meeting held in Monrovia, California on February 3-4, 2007 and the telephone conference call in which the US Championship was discussed held on February 25, 2007 be posted on the USCF website. These demands have been ignored. Plaintiff has been harmed by this, because if those tapes or transcripts were posted it would prove that Goichberg, Channing and Hall are lying and Sloan is telling the truth and not the other way around, because Goichberg, Channing and Hall claim that they are telling the truth and Plaintiff is lying.

85. Plaintiff is a close personal friend of Bobby Fischer, a former World Chess Champion and a fugitive from justice. The USCF by-laws have stated that all US grandmasters recognized as US grandmasters by FIDE, the World Chess Federation, are automatically USCF members. They thus should have their membership ID number posted on the USCF website. Bobby Fischer is recognized by FIDE as a US Grandmaster and thus under the by-laws is automatically a USCF member. USCF President Bill Goichberg has refused to put the name and ID Number of Bobby Fischer on the USCF Website on religious grounds in that Fischer is anti-Semitic. This is a violation of 42 USC 1983. This court should order that Bobby Fischer be recognized as a USCF member and his name and number be placed on the website. (As far as being a fugitive from justice is concerned, the USCF has 600 prison members, some of whom are psychopathic mass murderers. This is not by any means a bar to USCF membership.)

86. Plaintiff, while a member of the board, has persistently demanded to see all documents pertaining to the Pension/Profit Sharing Plan. Plaintiff believes that the USCF has either a huge liability or else no liability at all. In 2003 the USCF had 40 employees. On August 20, 2003, Beatriz Marinello, the new USCF President, fired 17 of them. In 2005, at the time of the move to Crossville, only seven employees agreed to move, and the rest were dismissed. Thus, the USCF has 33 former employees who have worked an average of seven years. Because almost all records have been lost or destroyed, it has been impossible to identify which employees are entitled to receive benefits. While Plaintiff was on the board, the USCF made two payments to former employees of about \$23,000 each. The employees were Jamie Anson and Barbara DeMaro. Plaintiff is informed by a former CFO that one of those two was not entitled to any money at all. Since the USCF Executive Director has been persisting stonewalling on this issue, plaintiff demands that the court order the relevant documents be produced, if they can be

found and still exist.

87. During the year 2006, Chess Life magazine was filled with pictures of Polgar, articles about Polgar to such an extent that in some issues one could hardly turn a page without finding more about Polgar. As a result, Chess Life became known sarcastically a "Polgar Life Magazine". During this entire time Polgar has played in only two chess tournaments and both of those tournaments were unofficial 30-minute events not rated by FIDE. Thus, Polgar had done nothing in 2006 to justify any publicity at all. This tremendous amount of favorable publicity was part of a conspiracy for her and her followers to run for election and be elected, so as to gain financial control of the USCF. They were not even required to pay the normal \$250 filing fee to run, as Polgar has stated on her blogspot that she only spent \$50 to run.

88. Throughout the 2006-2007 year when Plaintiff was on the board, USCF President blamed almost all of the problems the USCF was facing on Plaintiff, whereas the real problem was caused by Goichberg. For example, in November, 2006, Goichberg announced on the USCF website that the 2007 US Championship would be a 32 player knock-out event played partly online over the Internet with a final four in Las Vegas. Qualification to play in the tournament would be about 50% by playing in Bill Goichberg tournaments such as the North American Open and the American Open of Randy Hough, which are otherwise small, minor league events. This was an obvious case of self-dealing.

89. This announcement caused tremendous outrage among the members and the players, especially the part about playing the US Championship online. Only one top player, Joel Benjamin, agreed to play. There was no sponsor. Nobody was willing to put up money for this event.

90. This announcement of the online US Championship was never approved by the board. The board never discussed it and was never notified of it. The first time the board had ever heard of this plan was when we read it on the USCF website. The board would never have approved of this plan if it had been allowed to vote on it.

91. When this plan failed for lack of a sponsor, Goichberg blamed Plaintiff. It was all because of Sam Sloan that nobody was willing to sponsor this deal, claimed Goichberg. Actually, Sloan had nothing to do with it.

92. Finally, in March, 2007, Frank K. Berry of Stillwater, Oklahoma (and identical twin brother of the newly elected board member) bailed out the US Championship by putting up \$50,000. However, the prize money was small compared to the 2006 US Championship which has a \$250,000 prize fund and it required the players to travel to Oklahoma at their own expense. Most of the players live in the New York City area. As a result, Joel Benjamin protested vehemently and refused to play. Benjamin had been the only grandmaster willing to play under the original Goichberg plan of an online US Championship. Benjamin wrote an article published in "New In Chess" magazine in the Netherlands stating that all the problems with the US Championship were the fault of Sam Sloan. Benjamin blamed Plaintiff for things that were actually done by Goichberg, obviously buying the Goichberg story-line.

93. Throughout the one year that Plaintiff was on the board, Goichberg operated the USCF on the basis of one man rule. The big issues were not decided by discussion, debate and vote by the board. Goichberg decided and no decision by Goichberg could be overturned because he had the secure vote of his lapdog Hough and the vote of Channing who has stated that he will vote against anything that Sloan votes for and vice-versa. Sloan had three votes if he needed them and Goichberg had three votes whether he needed them or not. It has been the policy of Schultz to abstain any time he knows that he is

on the losing side and an abstain vote by Schultz is really a no vote.

94. Since in any 3-3 tie vote the motion fails, this meant that Goichberg could just do any thing he felt like and the opposition could never overturn his decision because the opposition only had three votes on a six vote board.

95. The best example of the problem this created was the US Championship. Traditionally the US Championship is a 16-player round robin with invitation by rating. Goichberg wanted it to be a big Swiss with qualification by Swiss tournaments organized by Goichberg and his allies Hough and Hanken. This of course puts money in Goichberg's pocket because the players in these big money Swisses must pay entry fees to Goichberg. The other board members, Sloan, Schultz and Marinello objected to this. Finally, at the February 3-4, 2007 meeting in Monrovia, California, Sloan made a motion modified slightly by Channing which provided that no decision could be made about the US Championship without a vote by the board. Goichberg surprisingly voted for this motion and it passed 6-0. Goichberg then proceeded to do what he had already been doing which is completely ignore the rest of the board. Goichberg invited whomever he wanted to invite, including an expert rated girl rated only 2188 while ignoring such really strong players as Ben Finegold who is rated 2611. The board would never have approved this. This is just one of many ridiculous and self-serving decisions that Goichberg made and will continue to make as long as he is allowed one-man rule of the USCF. Then, when things go wrong, Goichberg says that it is all the fault of Sam Sloan.

WHEREFORE, for all of the reasons set forth above, Plaintiff demands,

1. An order setting aside the July 2007 USCF election on the grounds of election fraud and other irregularities.
2. An order reinstating the three board members who lost their seats in the recent election, who were Sam Sloan, Don Schultz and Beatriz Marinello, until a new election is held.
3. An order providing that a new election be held at the earliest practicable date, to be supervised by the Department of Justice.
4. An order baring Paul Truong and Susan Polgar from running for election in the United States Chess Federation.
5. An order removing Joel Channing and Bill Goichberg from the Executive Board of Directors of the United States Chess Federation and barring them from running for election again.
6. An order removing of Bill Hall from his position as Executive Director of the United States Chess Federation for financial irregularities and other grounds.
7. An order reinstating Bobby Fischer as a member of the United States Chess Federation and directing that his membership and ID number be posted in the Membership Services Area of the USCF website.
8. Damages in the amount of twenty million dollars plus punitive and exemplary damages.

Samuel H. Sloan

